

REMARKS

Claims 1-3, 5-23, and 25-61 are pending. By this amendment, independent claims 1, 21 and 40 are amended to include subject matter previously claimed in dependent claims 6, 29 and 45, respectively. Claims 1, 21 and 45 are also amended to address section 112 rejections contained in the office action. Dependent claims 7, 15, 18, 19, 25, 29, 30, 39, 46, 53, 56 and 57 are also amended to address section 112 rejections contained in the office action. No range of equivalents is intended to be surrendered by these amendments. No new matter is introduced. Reconsideration and prompt allowance of the claims is respectfully requested.

Claims 1-61 are rejected under 35 USC 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claims the subject matter which applicant regards as the invention. Based on the amendments above and the discussion below, Applicants respectfully request withdrawal of these rejections.

Regarding claims 1 and 40, the Office Action states that it is unclear which “document object” is being referenced in line 18. Claims 1 and 40 are amended to clarify which document object is being referenced throughout the claims. Further, the Office Action states that it is unclear which “link reference” is being referenced in line 20. Reference is made in the rejection to “link relationship.” Applicants respectfully point out that “link reference” and “link relationship” are not the same thing. The specification and the claims make clear that link reference and link relationship are not the same thing. Consequently, the link reference mentioned in line 20 is clearly the link reference mentioned in lines 16-18. Therefore, Applicants respectfully assert that claims 1 and 40, as amended, are definite and their scope determinable. Applicants respectfully request withdrawal of this rejection.

Regarding claim 21, the Office Action states that it is unclear which “document object” is being recited in line 18. Claim 21 is amended to clarify which document object is being recited throughout the claim. The Office Action further states that the language “the relationship ... may be created ... and provided” in lines 3-4 does not require creation/providing and that the claim is, therefore, vague and ambiguous. The offending language is removed from the claim. Therefore, Applicants respectfully assert that claim 21, as amended is definite and the scope determinable. Applicants respectfully request withdrawal of this rejection.

Claims 7 and 46, and their dependent claims 8 and 47, respectively, are rejected because the Office Action asserts that it is unclear whether the document object table in line 7 is the same as the document object table in lines 3-4. Claims 7 and 46 are amended to clarify. Applicants respectfully request withdrawal of this rejection.

Claims 15, 18, 19, 25, 39, 53, 56 and 57 are rejected because the Office Action asserts they are unclear because they use the language “may be” and do not require further limiting of the claim. Applicants amended all of these claims to overcome this rejection. With regards to claims 18, 19, 56 and 57, Applicants respectfully assert that the language “may be” was being used to positively describe characteristics of the claimed invention. Applicants have replaced “may be” with “is capable of being” to more clearly express the intended meaning of the language. Applicants respectfully request withdrawal of this rejection.

Claims 1, 6-8, 16-17, 20, 40, 43, 45-48, 54-55, 58 and 60 are rejected under 35 USC 103(a) as being unpatentable over Dolan et al. (“Dolan”) in view of Rivette et al. (“Rivette”). Claims 2-3, 14, 41-42 and 52 over Dolan in view of Rivette and Li. Claims 5 and 44 are rejected under 35 USC 103(a) as being unpatentable over Dolan in view of Rivette and Chang. Claims 9-13, 15, 18-19, 49-51, 53 and 56-57 are rejected under 35 USC 103(a) as being unpatentable over Dolan in view of Rivette and Goerz Jr. et al. (“Goerz Jr”). Claims 21-23, 26-27, 29-39, 59 and 61 are rejected under 35 USC 103(a) as being upatentable over Dolan in view of Rivette and Goerz Jr. and Li. Claims 25 and 28 are rejected under 35 USC 103(a) as being unpatentable over Dolan in view of Rivette and Goerz Jr and Li and Chang. Applicants respectfully traverse these rejections.

First, the Office Action fails to provide a motivation to combine all of these references together. For example, when Dolan is combined with Rivette, Goerz, Li and Chang, the Office Action must provide a motivation to combine each reference with the others, not merely why to add one reference onto the end of a combination of other references. Specifically, the Office Action has not provided a motivation as to why one of ordinary skill in the art would combine all of these reference to teach what is claimed.

Second, even if combined, these references do not teach or suggest each and every limitation of the claims. To establish a *prima facie* case of obviousness ... the prior art reference (or references when combined) must teach or suggest all of the claim limitations. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) and MPEP § 2142.

For example, Dolan does not teach or suggest “creating a link relationship which references the first document object and the second document object,” as recited in claims 1 and 40. Dolan is, at best, merely identifying existing relationships between parents and children. See Figure 7 and corresponding description, especially col. 14, line 58 to col. 15, line 65. This discussion clearly establishes that Dolan is dealing with pre-existing links that are identified, not created: “[e]ach of the pointer fields of a link record contains a pointer which uniquely identifies a link record in navigation file 322 [*i.e.*, an existing link record in the navigation file] or is null to indicate that no link record is *identified*.¹” [Emphasis added]. Dolan does not teach creating these relationship, let alone the claimed link relationships. Rivette does not overcome this defect in Dolan. Consequently, neither claims 1 and 40, nor their dependent claims, are rendered obvious.

However, in order to expedite allowance and insure that the case issues, Applicants have amended claims 1 and 40 to incorporate subject matter from claims 6 and 45, respectively. Specifically, Applicants have amended claims 1 and 40 to recite that the storing includes

storing a link relationship entry in a link relationship table, wherein the link relationship entry comprises fields including a first link reference to the first document object and a second link reference to the second document object; and
assigning link relationship attributes to the link relationship entry.

Dolan does not teach or suggest assigning link relationship attributes to the link relationship entry. Dolan teaches a pre-determined/defined table in which various fields are populated. See Figure 7 and corresponding description. Dolan only teaches populating the fields, not assigning attributes. Among these fields that are populated are a parent pointer and children pointer. Dolan does not, however, teach or suggest assigning attributes about the parent child relationship. The only sense of this relationship is had from the fields in which the respective pointers are populated. No attributes about the relationship are assigned. Rivette does not overcome this defect in Dolan. Consequently, neither claims 1 and 40, nor their dependent claims, are rendered obvious.

Furthermore, none of the other references mentioned in the other rejections would overcome these defects in Dolan. Independent claim 25 includes similar features, incorporated from claim 29, which overcome Dolan in view of Rivette and Goerz Jr and Li and Chang for similar reasons. Specifically, neither Goerz Jr, Li nor Chang overcome the above-mentioned defects of Dolan. Consequently, independent claims 1, 25 and 40 are allowable. Dependent

claims 2-3, 5-23 and 26-61 are allowable for at least these reasons and their own independent features.

In view of the above remarks, Applicant respectfully submits that the application is in condition for allowance. Prompt examination and allowance are respectfully requested.

Should the Examiner believe that anything further is desired in order to place the application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

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